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REMARKS

Oath/Declaration

The Examiner has again pointed out that the citizenship of the fifth inventor is missing in the current Office Action. However, the supplemental Declaration has been already filed on June 21, 2004 via communication. The undersigned has confirmed via private PAIR that both communication and the supplemental Declaration are available in the electronic form. Subsequently, the Examiner has also confirmed the acceptance of the supplemental Declaration via a telephonic message.

Section 103 Rejections

The Examiner has rejected claims 1 through 4, 6 through 8, 10, 12 through 15, 17 through 19, 21, 23 through 28, 31 through 37 and 40 under 35 U.S.C. §103(a) as being allegedly obvious over the Baxter et al. reference in view of the Danneels reference. The Examiner has also rejected claims 5 and 16 under 35 U.S.C. §103(a) as being allegedly obvious over the Baxter et al. reference in view of the Danneels reference and further in view of the Slade reference. Similarly, the Examiner has rejected claims 9, 20, 29 and 38 under 35 U.S.C. §103(a) as being allegedly obvious over the Baxter et al. reference in view of the Danneels reference and further in view of Microsoft Press Computer Dictionary. Lastly, the Examiner has rejected claims 11, 22, 30 and 39 under 35 U.S.C. §103(a) as being allegedly obvious over the Baxter et al. reference and further in view of the Nguyen reference. In view of the above amendments and the following remarks, the Applicant respectfully requests the Examiner to reconsider the pending rejections.

For the rejection of pending independent claims 1 and 12, the Examiner has cited the Baxter et al. reference and the Danneels reference under 35 U.S.C. §103(a) as being allegedly obvious. The Examiner has pointed out that the Baxter et al. reference at

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column 7, lines 16-21 and column 9, lines 28-33 discloses a method of using a template to generate and update Web pages based upon specified trigger events that occur before a client requests the page. The Examiner has conceded that the Baxter et al. reference fails to disclose storing of "the page as one part in a table or storing an additional page based upon an update trigger call."

For the lack of the above disclosures, the Examiner has cited the Danneels reference at line 14, column 1 through line 55, column 2. The Examiner stated that the cited disclosures teach the "condition depicting their generation and what would cause them to be accessed," that are "contained within the database and associated with each version of the page." Thus, the Examiner has concluded that it would have been obvious to one of ordinary skill in the art at the time of the invention to have combined the method as disclosed in the Baxter et al. reference and the Danneels reference "because it would have allowed for pages to be preloaded that satisfy different conditions that are transparently mapped to a single URL..."

Without admitting the above allegations, the Applicant has further amended independent claims to further clarify the patentable features of the current invention. Newly amended independent claim 1 now explicitly recites "d) updating said generated dynamic page ... based upon said page template and said page generation call with said argument stored in said table in association with said page update trigger... in advance of another user page access request." Similarly, newly amended independent claim 12 now explicitly recites "said batch page generation unit updating said generated dynamic page ... based upon said page template and said page generation call with said argument stored in said table in association with said page update trigger... in advance of another above explicit recitations clarify the claimed invention

In contrast to the above explicit recitations of the patentable features of the current invention, the Baxter et al. reference discloses a Web content management system. As the Examiner correctly characterized, the Baxter content management system

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separately stores the content formats and the contents. In response to a Web page request, the Baxter content management system dynamically generates a display content page based upon the format information of the content and the content formats as disclosed at lines 60-67, column 1; lines 1-11, column 2; and lines 4 -7, column 6. Furthermore, the Baxter et al. reference also discloses content management control processes in which the Web page content is updated in response to an update trigger as described at lines 16-21, column 7 and lines 28-33, column 9. Lastly, the Baxter et al. reference discloses the dynamic generation of the customized Web page in response to a user request as described at lines 4-16, column 17.

The Baxter et al. reference fails to disclose, teach or suggest that the above dynamic generation of the customized Web page is stored prior to a user request. As described at lines 4-6, column 6, "[t]he assembly procedure 70, in response to requests, pulls the content and format components from the repository 60 and provides the assembled web pages to a web site 80." With respect to the flow charts in FIGURES 8 and 9, "the system interprets the request and retrieves personalization information for assembly" in the step 33 as disclosed at lines 4 through 52 in column 17. In the Baxter system, although components may be updated and stored in response to a trigger, no Web page is pre-assembled and stored in advance of an access request as "pages for display on the site are created in real time" as in line 43 of column 17.

As a result of the real time assembly, the system of the Baxter et al. reference fails to disclose, teach or suggest the use of "the batch page generation definition table" as explicitly recited in newly amended independent claims 1 and 12. The batch page generation definition table is used to determine if the updated page already exists. In fact, because the Baxter et al. system requires the real time update and assembly, there is no need for determining if it is necessary to generate an additional dynamic page in response to the user page access as in the claimed invention.

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In summary, the current invention as explicitly recited in newly amended independent claims 1 and 12 stores the Web page at a predetermine URL in advance of an access request and manages the reference to the stored page in "the batch page generation definition table." In sharp contrast, none of the tables in the Baxter et al. reference stores "said unique file name containing an element corresponding to said argument" as in "the batch page generation definition table." for the purpose of determining if it is necessary to generate an additional dynamic page in response to the user page access. Based upon the above patentable distinctions, Applicant respectfully submits that the Baxter et al. reference fails to teach, disclose or suggest the very concept of storing and accessing the pre-assembled dynamic Web page at a predetermined URL via "the batch page generation definition table."

Also in sharp contrast, the Danneels reference discloses a method of resolving a particular Web page entry based upon a condition and a URL. In other words, a plurality of Web pages are mapped to a single URL, and a condition determines which one of the Web pages as illustrated in a flow chart of FIGURE 2. To select an appropriate Web page, the system has to "evaluates conditions of a selected Web page set based on [the] current state information database" as depicted in the step 110 of FIGURE 2. In general, the conditions may be dependent upon "the status of devices or users external to [the] server" as described at lines 19-20 in column 3. For example, the state setting device might be "an environmental sensor, another computer system, another computer system, another electric device, etc." as described at lines 21-22 in column 3. The state setting signal includes "the on-line status of the content author of the web page sets" as described at lines 24-25 in column 3. Another exemplary setting signals include "the load of the server" as disclosed at line 29 in column 3 to determine the transfer rate of the Web page content data.

As discussed before, the current invention as explicitly recited in newly amended independent claims 1 and 12 stores in "the batch page generation definition table" the

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Web page at a predetermine URL that is referenced by "a unique file name" including "an element corresponding to said argument." On the other hand, the Danneels system requires a single URL and an additional condition to select a particular Web page. In the Danneels reference, a single URL alone does not resolve a particular page. In other words, the Danneels reference fails to disclose, teach or suggest the use of "the batch page generation definition table" to resolve a dynamic page. The Danneels reference fails to disclose, teach or suggest the use of "a unique file name" including "an element corresponding to said argument" as explicitly recited in newly amended independent claims 1 and 12.

For the sake of argument, even if the two cited references are combined, the combined disclosures still fail to teach, disclose or suggest the above discussed explicitly recited patentable features of the current invention to provide "the batch page generation definition table" containing "unique" file names that contain "an element corresponding to said argument." Furthermore, the claimed purpose of "the batch page generation definition table" is to resolve a dynamic page. The combined disclosures still fail to teach, disclose or suggest the claimed purpose and let alone the above specific table. Thus, Applicant respectfully submits that it would not have been obvious to one of ordinary skill in the relevant art to provide the method and the system as explicitly recited in newly amended claims 1 and 12 based upon the combined disclosures of the cited references.

Dependent claims 2 through 4, 6 through 8, 10, 13 through 15, 17 through 19 and 21, ultimately depend from either of newly amended claims 1 and 12 and incorporate the subject matter limitations of newly amended claims 1 and 12. Based upon the above reasons, Applicant respectfully submits to the Examiner that the rejections of pending claims 1 through 4, 6 through 8, 10, 12 through 15, 17 through 19 and 21 should be withdrawn.

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With respect to newly amended independent claims 23 and 32, the above discussed similar distinctions will be made to overcome the pending 103 rejections. As discussed above with respect to newly amended independent claims 1 and 12, newly amended independent claim 23 now explicitly recites "d2) updating said generated dynamic page ... based upon said page template and said page generation call with said argument stored in said table in association with said page update trigger... in advance of another user page access request." Similarly, newly amended independent claim 32 now explicitly recites "said batch page generation unit ... for updating said generated dynamic page ... based upon said page template and said page generation call with said argument stored in said table in association with said page update trigger... in advance of another page access request."

Furthermore, newly amended independent claims 23 explicitly recites a step c2) of "requesting a page via a user page access request containing a part of a URL to be generated" and a step d1) of "determining if the URL matches one of the predetermined URL's.' Similarly, newly amended independent claims 32 explicitly recites "said batch page generation unit receives a user page access request containing a part of a URL to be generated and said batch page generation control unit determines if the URL matches one of the predetermined URL's and allows access to the stored dynamically generated entire Web page." In addition, newly amended independent claims 23 and 32 both explicitly recite "the URL's containing an argument for a page generation as a part of the URL's." In other words, the URL is partially determined by the user page access request, and it is determined if the URL "containing an argument for a page generation" matches one of the predetermined URL's.

The current invention as recited in newly amended independent claims 23 and 32 also clearly distinguishes the two cited references. In other words, the URL's are tantamount to a file name to locate a unique memory location where a particular Web

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page is stored. The above explicit recitations clarify that the current invention calls for "a unique URL" that includes "an argument" such as a page update trigger or a page generation call "as a part of the URL's" so that the user can access a particular one of the stored dynamic pages that have been previously updated. Similarly, the subject matter limitations of newly amended independent claims 23 and 32 also require the determination whether or not "the URL matches one of the predetermined URL's."

The cited references alone or in combination fail to teach, disclose or suggest any aspect of the above patentable features where the URL's contain "an argument for a page generation as a part of the URL's" for "unique URL's." In fact, what is stored in the Baxter system is Web page components while the Danneels system, a single URL alone does not resolve a particular Web page. The current invention as explicitly recited in newly amended claims 23 and 32 calls for "a unique URL" that contains an argument for a page generation as a part of the URL's." Furthermore, newly amended independent claims 23 and 32 also require the determination whether or not "the URL matches one of the predetermined URL's." The cited references alone or in combination fail to teach, disclose or suggest the above match determination of the URL "contains an argument for a page generation as a part of the URL's." Thus, it would not have been obvious to one of ordinary skill to provide the above patentable feature of newly amended independent claims 23 and 32 based upon the Baxter et al. reference and the Danneels reference alone or in combination.

Dependent claims 24 through 28, 31, 33 through 37 and 40 ultimately depend from either of newly amended claims 23 and 32 and incorporate the subject matter limitations of newly amended claims 23 and 32. Based upon the above reasons, Applicant respectfully submits to the Examiner that the rejections of pending claims 23 through 28, 31 through 37 and 40 should be withdrawn.

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The rejections of other dependent claims 5, 9, 11, 16, 20, 29, 30, 38 and 39 are also includes the same combination of the Baxter et al. reference and the Danneels reference. Since the additional reference is cited for additional subject matter limitations of the above dependent claims, the previously presented arguments to overcome the Baxter et al. reference and the Danneels reference are still applicable. For this reason, Applicant respectfully submits that the section 103 rejections of dependent claims 5, 9, 11, 16, 20, 29, 30, 38 and 39 should be also withdrawn.

Conclusion

In view of the above amendments and the foregoing remarks, Applicant respectfully submits that all of the pending claims are in condition for allowance and respectfully request a favorable Office Action so indicating.

Respectfully submitted,

PATENT

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